

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ABRAHAM ADENIYI,

Defendant.

SEALED INDICTMENT

21 Cr. _____

21 CRIM 159

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

1. From in or about 2017, up to and including in or about 2020, in the Southern District of New York and elsewhere, ABRAHAM ADENIYI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956.

2. It was a part and an object of the conspiracy that ABRAHAM ADENIYI, the defendant, and others known and unknown, knowing that the property involved in certain financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the

transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit, ADENIYI opened and directed others to open multiple bank accounts, which received proceeds of various fraud schemes, and transferred and directed others to transfer those proceeds among the bank accounts he had opened as well as to other bank accounts controlled by participants in the schemes in order to conceal and disguise the source, location, ownership and control of the funds.

(Title 18, United States Code, Section 1956(h).)

COUNT TWO
(Conspiracy to Commit Bank Fraud)

The Grand Jury further charges:

3. From in or about 2017 up to and including in or about 2020, in the Southern District of New York and elsewhere, ABRAHAM ADENIYI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

4. It was a part and an object of the conspiracy that ABRAHAM ADENIYI, the defendant, and others known and unknown, would and did knowingly execute and attempt to execute a scheme to

defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, ADENIYI participated in a scheme to use fraudulent identification information to open multiple bank accounts at FDIC-insured banks, and obtain the funds in those accounts.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, ABRAHAM ADENIYI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

6. As a result of committing the offense alleged in Count Two of this Indictment, ABRAHAM ADENIYI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United

States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

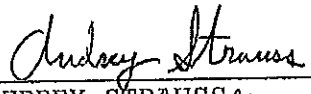
7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; and
Title 21, United States Code, Section 853(p).)


FOREPERSON


AUDREY STRAUSS ^{AC}
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58).

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(18 U.S.C. §§ 1956 and 1349.)

AUDREY STRAUSS
United States Attorney


Foreperson
